

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re:)
) 3:08-bk-01270
Vincent John Cusano)
d/b/a Vinnie Vincent Music,) Chapter 13
a/k/a Vinnie Vincent) George C. Paine II
)
Debtor.)

OBJECTION TO CONFIRMATION OF PLAN

Gene Klein, Paul Stanley, The KISS Company, Gene Simmons Worldwide, Inc., Simstan Music, Ltd. and KISStory, Ltd. ("Creditors") object to confirmation of Debtor's proposed plan and would show until the Court as follows:

1. The Debtor filed a voluntary petition for relief on February 15, 2008.
2. The Creditors reject the Debtor's proposed plan.
3. The Debtor has proposed a plan, which lists in Item 10. Executory Contracts and Unexpired Leases alleged interests in copyright agreements, an employment contract, a settlement agreement and a songwriter agreement with one or more of the Creditors. No treatment of the secured claims or any alleged executory contracts with the Creditors is proposed by the Debtor.
4. The Creditors hold a judgment lien on all copyrights owned by the Debtor, which was recorded in the United States Copyright Office on November 30, 2004 in Volume 3517, Document No. 777, a copy of which is attached hereto and incorporated herein by reference as Exhibit 1.
5. The Creditors hold a judgment that was entered on September 5, 2003 against the

Debtor, a copy of which is attached hereto and incorporated herein by reference as Exhibit 2.

6. The plan fails to comply with 11 U.S.C. § 1325(a)(5) in that the holder of the secured claim has rejected the plan, the plan does not provide that the holder of the claim will retain its lien, the plan as of the effective date does not provide for the distribution of the property in an amount not less than the allowed amount of the Creditors' claim, and the plan does not propose equal monthly payments to the secured creditor and adequate protection for interests of the secured creditor.

7. The plan violates 11 U.S.C. § 1322 (b)(7) in that the Plan fails to provide for the assumption, rejection or assignment of executory contracts alleged to be owned by the Debtor.

8. The plan fails to comply with 11 U.S.C. § 1325 (a)(1) and (3).

WHEREFORE, premises considered, the Creditors pray this Court deny confirmation to Debtor's proposed plan and grant the Creditors such other and further relief as is just and proper.

Respectfully submitted,

NEAL & HARWELL, PLC

By: /s/ Marc T. McNamee

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Counsel for Gene Klein, Paul Stanley, The Kiss
Company, Gene Simmons Worldwide, Inc.,
Simstan Music, Ltd. and KISSStory, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all parties listed below through the Court's ECF system if registered to receive electronic notice or by U.S. mail if not so registered on this 24th day of March, 2008.

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/s/ Marc T. McNamee